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DUE DATE

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CORDOVA, R.C DAVIS, J.G. FERRERA, D.W. HANNI, B.J. HEALY, T.J HEDAHL, T.G. HILBIG, J.G. KIRBY, W.A. KUESTER, A.W. TEF E.M. MANN, H.P MARX, G.E McKENNA, F.G. MORGAN, R.V. PIZZUTO, V.M. POTTER, G.L. RILEY, J.H. SANDLIN, N.B SATTERWHITE, D.G.

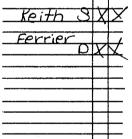
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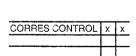
SHEPLER, R. L.

SULLIVAN, M.T SWANSON, E.R

WILKINSON, R.B.

WILSON, J.M. ZANE, J.O.





Reviewed for Addressee Corres, Control RFP

Ref Ltr. #

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Denver, Colorado 80222-1530 4210 E. 11th Avenue Phone (303) 692-2000

June 24, 1993

Laboratory Building Denver, Colorado 80220-3716 (303) 691-4700

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ROCKY FLATS PLANT

CORRESPONDENCE CONTROL



Roy Romer Covernor

Patricia A. Nolan, N Executive Director

Mr. Richard J. Schassburger U.S Department of Energy Rocky Flats Plant Building 116 P. O. Box 928 Golden, Colorado 80402-0928

RE: COMMENTS; Draft Appendix E, Quality Assurance Addendum (QAA) to Decision Document (Building 910) for Evaporation Ponds (OU-4), submitted April 20, 1993

Dear Mr. Schassburger:

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document submitted by DOE and prime contractor, EG&G. The Division's comments are attached.

The Division, as lead regulatory agency, hereby grants conditional approval to the subject QAA. The comments must be satisfactorily resolved and the QAA issued in final form before full approval will be granted. Please submit a revised document by July 26, 1993.

If you have any questions concerning the attached comments, please call Harlen Ainscough of my staff at 692-3337.

Sincerely,

Gary W. Baughman, Chief

Facilities Section Hazardous Waste Control Program

Attachments

cc: Daniel S. Miller, AGO Jackie Berardini, CDH-OE Martin Hestmark, EPA Arturo Duran, EPA Frazer Lockhart, DOE Scott Surovchek, DOE Ernie O'Toole, DOE

Steve Keith, EG&G Don Ferrier, EG&G

ADMIN AECORG

Colorado Department of Health

Hazardous Materials & Waste Management Division

Comments

on

DRAFT

Appendix E

Quality Assurance Addendum

to

IM/IRA Decision Document

(Building 910)

for

SOLAR EVAPORATION PONDS

(OU-4)

ROCKY FLATS PLANT

submitted

April 20, 1993

General Comment:

This document would greatly benefit from an Acronyms List. An annotated list, explaining the roles of internal organizations or protocols would be helpful. For example what is COEM or IWCP and what does it or they do?

Specific Comments:

Section 6.3.2.8: In consultation with Richard Fox of the Air Pollution Control Division (APCD) of the Colorado Department of Health, the Hazardous Materials and Waste Management Division (HMWM) has learned that operation of the evaporators for only 110 days per year, is an enforceable APCD Emission Permit condition. This limitation of operational hours was placed on the permit because DOE did not choose to obtain a Prevention of Significant Deterioration (PSD) permit. The PSD permit requires, at a minimum, one year of ambient monitoring data. In this case for oxides of nitrogen (NOx), since operating at potential levels would create NOx emissions which would trigger PSD requirements. DOE determined

it was more feasible to restrict the hours of operation, thus reducing the NOx emissions below the level requiring a PSD permit. HWMWD understands that DOE could perform air monitoring and seek a PSD permit which, if approved, would allow Building 910 to operate Since the permit process would take more year-round on demand. than a year from the date of submission of the PSD permit application, the Division supports use of the present approach to allow timely start-up of Building 910; however, limiting Building 910 to 110 days per year is not sanctioned in the IM/IRA Decision DOE must take the necessary steps to ensure that the full capacity of Building 910 is available to process Interceptor Trench and Solar Pond waters as needed. Looking ahead, Building 910 may be suitable for other uses and it may be appropriate for DOE to ensure the full capacity by seeking the PSD permit from APCD.

Section 6.12: The Division does not believe that daily or periodic calibration requirements can be assured by placing stickers on the instruments. The Metrology Lab Calibration List which identifies calibration requirements and frequencies should include a calibration record that indicates the date, time and the individual who performed the calibration to ensure that the requirements were met.